

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STEVEN FLOYD, JOLENE FURDEK, and  
JONATHAN RYAN, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation, and APPLE INC., a California  
corporation,

Defendants.

Case No. 2:22-cv-01599-KKE

**STIPULATED MOTION AND  
[PROPOSED] ORDER REGARDING  
PLAINTIFF STEVEN FLOYD'S  
DEADLINE TO RESPOND TO  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION**

NOTE ON MOTION CALENDAR:  
August 29, 2024

**STIPULATION**

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs Steven Floyd, Jolene Furdek, and Jonathan Ryan (“Plaintiffs”), and Defendants Amazon.com, Inc. and Apple Inc. (together, “Defendants”), hereby stipulate and agree through counsel to the following.

1. On May 17, 2024, Apple filed a motion to compel discovery from Plaintiff Steven Floyd. Dkt. No. 104.

2. On August 16, 2024, the Court granted Apple’s motion and ordered Mr. Floyd to respond to interrogatories and requests for production by August 30, 2024. Dkt. No. 132.

3. Following entry of the Court’s Order, Mr. Floyd made contact with Plaintiffs’ counsel, and Plaintiffs’ counsel is attempting to coordinate with Mr. Floyd to comply with the Court’s order.

4. Subject to the Court’s approval, the parties have agreed to a two-week extension to give Mr. Floyd additional time to respond to interrogatories and requests for production.

5. This extension will make Mr. Floyd’s responses to interrogatories and requests for production due on September 13, 2024, the same day as the deadline for the substantial completion of production of documents and data in this case.

6. Subject to reviewing Mr. Floyd’s responses to interrogatories and production of documents, the parties do not anticipate that the extension will affect the Court’s deadline of September 30, 2024, for Mr. Floyd’s deposition.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 DATED: August 29, 2024

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO  
3 LLP

4 By: /s/ Steve W. Berman

Steve W. Berman, WSBA #12536

5 By: /s/ Barbara A. Mahoney

Barbara A. Mahoney, WSBA #31845

1301 Second Avenue, Suite 2000

6 Seattle, WA 98101

7 Ph: (206) 623-7292; Fax: (206) 623-0594

steve@hbsslaw.com

barbram@hbsslaw.com

8 Ben M. Harrington (*pro hac vice*)

9 Benjamin J. Siegel (*pro hac vice*)

715 Hearts Avenue, Suite 300

10 Berkeley, CA 94710

Telephone: (510) 725-3000

11 Facsimile: (510) 725-3001

benh@hbsslaw.com

12 bens@hbsslaw.com

13 *Attorneys for Plaintiffs and the Proposed Class*

14 DAVIS WRIGHT TREMAINE LLP

15 By: /s/ John Goldmark

John Goldmark, WSBA #40980

16 MaryAnn Almeida, WSBA #49086

920 Fifth Avenue, Suite 3300

17 Seattle, WA 98104-1610

18 Phone: (206) 622-3150

Fax: 206-757-7700

19 johngoldmark@dwt.com

maryannalmeida@dwt.com

20 SIDLEY AUSTIN LLP

21 Jonathan E. Nuechterlein (*pro hac vice*)

22 Benjamin M. Mundel (*pro hac vice*)

23 Jon Dugan (*pro hac vice*)

1501 K Street, N.W.

24 Washington, D.C. 20005

Phone: (202) 736-8000

25 Fax: (202) 736-8711

Fax: 206-757-7700

26 juechterlein@sidley.com

bmundel@sidley.com

27 jdugan@sidley.com

28 *Attorneys for Amazon.com, Inc.*

ORRICK, HERRINGTON & SUTCLIFFE LLP

By /s/ Mark S. Parris

Mark S. Parris (WSBA No. 18370)

mparris@orrick.com

401 Union Street, Suite 3300

Seattle, WA 98101

Telephone: +1 206 839 4300

Facsimile: +1 206 839 4301

WEIL GOTSHAL & MANGES, LLP

By: /s/ Mark A. Perry

Mark A. Perry (*pro hac vice*)

2001 M. Street NW, Suite 600

Washington, D.C. 20036

Telephone: +1 202 682 7000

mark.perry@weil.com

By: /s/ Eric S. Hochstadt

Eric S. Hochstadt (*pro hac vice*)

767 Fifth Ave.

New York, NY 10153-0119

Telephone: +1 212 310 8000

eric.hochstadt@weil.com

By: /s/ Brian G. Liegel

Brian G. Liegel (*pro hac vice*)

Brian.liegel@weil.com

1395 Brickell Avenue, Suite 1200

Miami, FL 33131

Telephone: +1 305 577 3180

*Attorneys for Apple Inc.*

**ORDER**

Based on the foregoing, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Kymberly K. Evanson  
UNITED STATES DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2024, a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Steve W. Berman  
Steve W. Berman